

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,	)	Criminal No. 20-181 (PJS/BRT)
	)	
Plaintiff,	)	
v.	)	<b>DEFENDANT’S POSITION</b>
	)	<b>ON RESTITUTION</b>
BRANDEN MICHAEL WOLFE,	)	
	)	
Defendant.	)	

The defendant requests restitution be set in the amount of \$12,000, a fair and proportionate amount of the total loss in this case, pursuant to the principles set forth in *Paroline v. United States*, 572 U.S. 434, 448 (2014), in which the Supreme Court held that “restitution is therefore proper under §2259 only to the extent the defendant’s offense proximately caused a victim’s losses.” Mr. Wolfe pushed a barrel onto a pile of debris outside the front of the precinct (as captured in the photo of the government’s position paper) and did not start any fires. Accordingly, the losses “proximately caused” by the defendant was minimal, as should be the losses attributed to him for restitution purposes.

Dated: April 30, 2021

Respectfully submitted,

*s/ Douglas Olson*

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